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which is for the benefit of taxpayers, must be paid by the city. *Wheeler v. Phila.*, 77 Pa. St. 338. Neither does the constitutional provision, prohibiting a city from loaning its money or credit in aid of any other corporation, restrict municipalities from constructing their own railroads and paying therefor when necessary and when authorized by the legislature. *Sun Printing Co. et. al. v. Mayor et als., of New York*, 152 N. Y. 257. And so it has been held that even though a city is required in the first instance to pay the cost of a public burden, to be reimbursed thereafter by a tax upon the property, this does not constitute a loan to the property owners within the constitutional prohibition against loaning. *People v. Banks*, 67 N. Y., 568.

PATENTS—INFRINGEMENT—USE OF ARTICLE BROUGHT FROM FOREIGN COUNTRY.—*DAUNLER MFG. CO. V. CONKLIN*, 170 FED. 70.—*Held*, that a purchaser, in a foreign country of an article patented in the United States, although from one authorized to sell it, is chargeable with infringement if he brings it into the United States and there uses it.

It is well settled that an article, patented in the United States, purchased in a foreign country from one authorized to sell it, cannot be imported for sale in the United States. *Boesch v. Graff*, 133 U. S. 697. And some cases hold that there is no difference between using and selling. *Fetherstone v. Ormonde Cycle Co.*, 53 Fed. 110. But many courts hold that the sale of a patented article by an assignee within his territory carries the right to use it everywhere. *Edeson Co. v. Goelet*, 65 Fed. 613.

PHYSICIANS AND SURGEONS—EMPLOYMENT—CONTRACTS.—*HALL V. ALLEN*, 104 PAC. 489 (COL.).—A brother, twenty-five years old, without means and away from his parents was injured and a physician began to treat him. A sister subsequently wrote to the physician requesting information as to his condition and stating that the expenses would be paid. *Held*, that the sister directly employed the physician at her own expense, authorizing a recovery against her for services rendered after the receipt of the letter.

Where there has been a promise, express or implied, to pay for the services rendered by a physician to a third person, the physician has a right to maintain an action against the person making such promise to recover for professional services. *Bradley v. Dodge*, 45 Howe Pr. 57 (N. Y.); *White v. Mastin*, 38 Ala. 147. And such liability is not affected by the fact that the liability was not assumed until after the physician had made several visits to the patient without the knowledge or procurement of such person. *King v. Edmiston*, 88 Ill. 257. He may also recover where the circumstances are such as to show an intention to pay him for his professional services. *Smith v. Watson*, 14 Vt. 332. Some states even hold that one who requests a physician to attend another,